# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TRIBUNE COMPANY FRAUDULENT CONVEYANCE LITIGATION	) ) Case No.: 11-md-2296-RJS ) ) Case No.: 11 Civ. 4784 (RJS)
DEUTSCHE BANK TRUST COMPANY AMERICAS,  Plaintiff,	) ) ) ) NOTICE OF MOTION AND MOTION ) TO WITHDRAW AS COUNSEL
-against-  ADALY OPPORTUNITY FUND TD SECURITIES INC. C/O ADALY INVESTMENT MANAGEMENT CO., et al.,	) ) ) )
Defendants.	

PLEASE TAKE NOTICE that the undersigned counsel, D. Ross Martin, a member of Ropes & Gray LLP, pursuant to Local Rule 1.4, respectfully moves to withdraw as counsel of record in the above-captioned proceeding for the following defendants:

- Stichting Pensioefonds Zorg en Welzijn
- Stichting Pensioenfonds van de ABN AMRO
- Stichting Pensioenfonds Océ
- Stichting Pensioenfonds Hoogovens

All remaining Ropes & Gray LLP attorneys who have appeared will continue to represent the defendants listed above.

/s/ D. Ross Martin

D. Ross Martin, Esq.
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Dated: Boston, Massachusetts March 5, 2018

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 5, 2018, the attached Notice of Motion and Motion to Withdraw as Counsel was filed electronically through the CM/ECF system, which will send notice to the registered participants identified on the Notice of Electronic Filing.

/s/ Joshua Y. Sturm Joshua Y. Sturm

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DEUTSCHE BANK TRUST COMPANY AMERICAS,	) ) Case No.: 11 Civ. 4784 (RJH)
Plaintiff,	) )
-against-	) )
ADALY OPPORTUNITY FUND TD SECURITIES INC. C/O ADALY INVESTMENT MANAGEMENT CO., et al.,	) ) )
Defendants.	)
	) ) )

### [PROPOSED] ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL

The Court, having considered the motion seeking leave, pursuant to Local Rule 1.4, for D. Ross Martin to withdraw as counsel of record in the above-captioned cases for the following defendants:

- Stichting Pensioefonds Zorg en Welzijn
- Stichting Pensioenfonds van de ABN AMRO
- Stichting Pensioenfonds Océ
- Stichting Pensioenfonds Hoogovens

And it appearing to the Court that the relief requested is appropriate;

IT IS HEREBY ORDERED that D. Ross Martin is granted leave to withdraw as counsel of record in these actions and that such withdrawal is effective immediately.

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DATED:	, 2018	SO ORDERED:
		The Honorable Richard J. Sullivan
		UNITED STATES DISTRICT JUDGE